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January 20, 1998

David Waddell
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

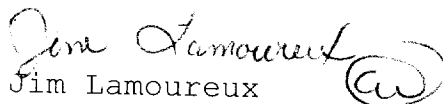
In Re: *BellSouth Telecommunications, Inc.'s Entry
into Long Distance (interLATA) Service in
Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996*

Docket No: 97-00309

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of
AT&T's Motion for Leave to Conduct Written Discovery and
AT&T's First Set of Data Requests to BellSouth
Telecommunications, Inc.

Sincerely,


Jim Lamoureux

cc: Parties of record

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

'97 JAN 20 AM 11 03

In Re: BellSouth Telecommunications, Inc.'s)
Entry into Long Distance (interLATA) Service in)
Tennessee Pursuant to Section 271 of the)
Telecommunications Act of 1996)

Docket No. 97-00309

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.'S
MOTION FOR LEAVE TO CONDUCT WRITTEN DISCOVERY**

AT&T Communications of the South Central States, Inc. ("AT&T") hereby submits this Motion for Leave to Conduct Written Discovery in this proceeding. In support of its Motion, AT&T states as follows:

The current procedural schedule does not provide for the parties to conduct discovery in this proceeding, and neither the Tennessee Code or the Rules of the TRA provide for discovery as of right in contested cases. Accordingly, AT&T submits this Motion for Leave to Conduct Discovery.

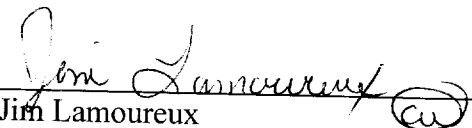
Attached to this Motion are the Discovery Requests AT&T wishes to serve on BellSouth. The requests concern two general subjects: (1) BellSouth's proposed interfaces to its Operational Support Systems, and (2) the manner in which BellSouth intends to provision unbundled network elements in Tennessee so that AT&T and others may combine them to provide telecommunications services as required under § 251(c)(3) of the federal Telecommunications Act of 1996. Both of these issues were addressed by the FCC in its recent decision denying BellSouth's application for authority under § 271 of the Act to provide interLATA services in South Carolina. AT&T has thus limited its discovery requests to these two very important issues which were specifically addressed by the FCC in its recent South Carolina decision.

Both of these issues apply to BellSouth not only in South Carolina, but throughout its entire region, and are thus of concern in this Tennessee proceeding. Moreover, because these issues were both specifically addressed by the FCC in its South Carolina decision, it is likely that they will be addressed again by the FCC if and when BellSouth files at the FCC for authority to provide interLATA services in Tennessee. For this reason, AT&T believes it is important that the TRA have as much information as possible to address these issues in order to perform its consultative role under the Act.

For these reasons, AT&T respectfully requests that the TRA grant its Motion for Leave to Conduct Written Discovery, and require BellSouth to respond to the attached written discovery requests in a reasonable amount of time.¹

Respectfully submitted,

**AT&T COMMUNICATIONS OF THE
SOUTH CENTRAL STATES, INC.**


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Attorney for AT&T Communications
of the South Central States, Inc.

Dated: January 20, 1998

¹ On January 16, 1998, AT&T filed a Motion to Dismiss this proceeding. In the event that motion is granted, AT&T will agree to withdraw or hold in abeyance this Motion to Conduct Written Discovery.

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: BellSouth Telecommunications, Inc.'s)	
Entry into Long Distance (interLATA) Service in)	
Tennessee Pursuant to Section 271 of the)	Docket No. 97-00309
Telecommunications Act of 1996)	

**AT&T'S FIRST SET OF DATA REQUESTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T") hereby serves its First Set of Data Requests to BellSouth Communications, Inc. ("BellSouth"), to be answered in writing under oath.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, including, but not limited to BellSouth Corporation and BellSouth Long Distance, Inc., their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.
4. "The Act" means the Telecommunications Act of 1996, Pub.L.104-104, 110 Stat. 56 (1996).
5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is (or was

formerly) in the possession, custody or control of BellSouth, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files and any other information-carrying media; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements, and indices on any media whatsoever, including, without limitation, paper, film, any form of electronic, computerized, digitalized, or magnetic storage, and all other methods for the expression or retention of information.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

8. The terms "referring to" or "relating to" mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these data requests and information what would not otherwise be brought within their scope.

10. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification," when used in reference to a natural person, means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present or last known telephone number of the person.

12. "Identify" or "identifying" or "identification," when used in reference to a person other than a natural person, means to state:

- a) the full name of the person and any names under which it conducts business;
- b) its present or last known principal place of business;
- c) the present or last known telephone number of the person; and
- d) the name of the chief executive officer of that person.

13. "Identify" or "identifying" or "identification," when used in reference to a document, means to provide with respect to each document requested to be identified by these data requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity," when used in reference to a communication, means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

15. "Including" means "including, but not limited to."

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state

the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged).
- d) the identity of the author(s) and/or preparer(s) and the addressee(s) (if any) of any document withheld as privileged.

2. If you contend that the response to any data request may be withheld on the grounds that it includes customer account records, or that such response constitutes proprietary confidential business information, please mask any customer-specific information that would enable AT&T to identify particular customers (other than AT&T) and identify with specificity the type of information so masked and the reasons for withholding such information.

3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

4. If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for your inability to respond fully. If you object to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.

6. The answer to each data request should first restate the question asked and also provide the name of the person or persons supplying the information.

7. Unless otherwise stated, these data requests concern the time period from February 8, 1996 to the present.

INTERROGATORIES

1. Please state, with respect to all orders received from CLECs since January 1, 1997:
- (a) the total number and percentage of orders sent from LEO (Local Exchange Ordering) to LESOG (Local Exchange Service Order Generator);

- (b) the total number and percentage of orders sent from LEO to the LCSC (Local Carrier Service Center);
- (c) the total number and percentage of orders sent from LESOG to SOCS (Service Order Centralization System); and
- (d) the total number and percentage of total orders that LESOG was unable to process.

2. With respect to all CLEC orders that LESOG did not process since January 1, 1997, describe how each such order was processed, including whether the orders were processed manually.

3. For any orders for unbundled loops that BellSouth has received from CLECs (both in Tennessee and region-wide) since February 8, 1996:

- (a) Identify the number of orders received by BellSouth for unbundled loops by month from February 1996 to the present. If "by month" data is not available, then provide the requested data in any format available to show the volume of orders over time.
- (b) Provide a breakdown showing the number of such orders that were provisioned within:
 - (1) 2 days of the order;
 - (2) 5 days of the order;
 - (3) 6-10 days of the order;
 - (4) 11-20 days of the order; and
 - (5) more than 20 days of the order.

In addition, please indicate the longest time interval BellSouth has taken to provision an unbundled loop and explain the circumstances.

4. For any orders for basic service lines at a wholesale discount (i.e., Total Service Resale, or "TSR" orders) received by BellSouth (both in Tennessee and region-wide) since February 8, 1996:

- (a) identify the number of orders received by BellSouth for TSR by month from February 1996. If "by month" data is not available, then provide data in any formats available to show the total volume of orders over time.
- (b) provide a breakdown showing the number of such orders that were provisioned within:
 - (1) 2 days of the order;
 - (2) 5 days of the order;

- (3) 6-10 days of the order;
- (4) 11-20 days of the order; and
- (5) more than 20 days of the order.

In addition, please indicate the longest time interval BellSouth has taken to provision an order for resale and explain the circumstances.

- 5. Describe the largest number of orders (from all CLECs combined) for unbundled loops that BellSouth has received on a single day (both on a region-wide basis and in each state in BellSouth's region, including Tennessee), and the day on which such orders were received.
- 6. Describe the largest number of orders (from all CLECs combined) for unbundled loops that BellSouth has processed on a single day (both on a region-wide basis and in each State in BellSouth's region, including Tennessee), and the day on which such orders were processed.
- 7. Describe the largest number of orders (from all CLECs combined) for resold local lines that BellSouth has received on a single day (both on a region-wide basis and in each State in BellSouth's region, including Tennessee), and the day on which such orders were received.
- 8. Describe the largest number of orders (from all CLECs combined) for resold local lines that BellSouth has processed on a single day (both on a region-wide basis and in each State in BellSouth's region, including Tennessee), and the day on which the orders were processed.
- 9. Describe, both for Tennessee and on a region-wide basis:
 - (a) the number of requests for its own basic exchange service that BellSouth receives on an average day;
 - (b) the largest number of requests for its own basic exchange service that BellSouth has received on any day within the last two years;
 - (c) the largest number of requests for its own basic exchange service that BellSouth has processed on a particular day within the last two years.
 - (d) describe the basis for determining your responses to (a) - (c).
- 10. Identify all CLECs with whom BellSouth has tested:
 - (a) LENS;
 - (b) EDI (whether Phase I, Phase II, or otherwise);
 - (c) EXACT;
 - (d) TAFI;
 - (e) EBI;
 - (f) the Billing Daily Usage File;
 - (g) EC Lite;
 - (h) API Gateway;

(i) any other interface.

11. Describe the business rationale for BellSouth's decision to develop the API Gateway.
12. Describe each purpose for which BellSouth anticipates the API Gateway will be utilized.
13. Describe with specificity all entities that BellSouth anticipates may utilize the API Gateway.
14. Describe the expected time frame for development of the API Gateway, including the date(s) on which the API Gateway is expected to be available to CLECs and any BellSouth affiliate.
15.
 - (a) State the number of electronic transactions for pre-ordering, ordering, billing, and maintenance and repair for unbundled network elements and resale that have been attempted by CLECs in Tennessee and in BellSouth's region to date.
 - (b) State the number of such electronic transactions that have been successfully completed.
 - (c) With respect to those electronic transactions that have been attempted but were not successfully completed, state the reasons for such failures.
16. How many CLEC transactions, for each function, i.e., preordering, ordering, billing, maintenance and repair, disaggregated by interface, can BellSouth process per day (both on a region-wide basis and in Tennessee)?
 - (a) State the maximum number of CLEC transactions for each function per interface.
 - (b) State the basis for determining this capacity.
 - (c) State the geographic reach or limitations of this capacity.
 - (d) State the projected capacity for each quarter of 1998.
 - (e) Identify any assumptions that were made in calculating capacity, including but not limited to:
 - (i) the percentage of CLEC transactions that are expected to require complete manual processing for each function;
 - (ii) the percentage of CLEC transactions that are expected to fall out

for some manual processing;

- (iii) the resources to be devoted to each OSS function; and
- (iv) the average time required to perform each OSS function.

17. Describe the total projected demand from CLECs for all transactions for each operational support system, by quarter, in 1998, both for Tennessee and for the BellSouth region. Describe in detail the basis for your response.

18. (a) Describe the growth in demand for checklist items from CLECs that BellSouth anticipates:

- (1) over the next 12 months;
- (2) over the next five years.

(b) Describe in detail the steps that BellSouth has taken, and will take, to meet the growth in demand described in sub-part (a).

19. Identify all steps that are required to increase the capacity of BellSouth's operational support systems, the time required to increase the capacity, and the cost of increasing the capacity. Your answer should include, but is not limited to, a discussion of the steps required to increase the capacity of each of the following interfaces, the time required to increase the capacity of each such interface, and the cost of increasing the capacity of each such interface:

- (a) LENS;
- (b) EDI;
- (c) EXACT;
- (d) EBI;
- (e) TAFI;
- (f) EC Lite.

20. (a) State whether manual or human intervention is or will be required after initial CLEC data entry when using the interfaces offered by BellSouth to perform the pre-ordering, ordering, maintenance and repair, or billing functions. If your answer is in the affirmative, identify:

- (1) the function(s) for which manual or human intervention is or will be required;
- (2) the criteria that BellSouth used in determining whether such manual or human intervention is or will be required;
- (3) any steps that CLECs could take that would minimize or make

unnecessary such manual or human intervention.

- (b) Describe each OSS interface that is currently capable of processing CLEC transactions without manual intervention, and identify the date on which the functions became so mechanized.

21. State the number and percentage of orders/ transactions from CLECs that have required or will require manual or human intervention by BellSouth since January 1, 1997, by quarter, both for Tennessee and for the BellSouth region. As part of your response:

- (a) Describe the total number of orders/ transactions received from CLECs by BellSouth during 1997, by month and quarter;
- (b) Describe the percentage of orders/ transactions submitted by CLECs that have flowed through automatically to BellSouth's legacy systems without human or manual intervention;
- (c) Describe the number and percentage of orders/ transactions submitted by CLECs that have fallen out to manual processing, and identify with specificity the reasons for the fall-out;
- (d) Describe the basis for your response to sub-parts (a) - (c), and identify any documents used to calculate the number of orders requested herein.

22. For each month since January 1, 1997, both for Tennessee and for the BellSouth region, identify:

- (a) the total number of customer service orders processed by BellSouth for its own retail customers;
- (b) the number of those orders that were completed;
- (c) the number of those orders that were rejected (and the reasons for the rejections);
- (d) the number and percentage of those orders that required manual intervention (after the point of initial entry by a BellSouth service representative) for completion of the order; and
- (e) to the extent that any of the orders required manual intervention by BellSouth, the reason or reasons why manual intervention was necessary for the completion of the order.

23. Of the total number of orders received from CLECs since January 1, 1997 for resold lines and unbundled network elements, identify both for Tennessee and for the BellSouth region:

- (a) the number and percentage of such orders on which BellSouth modified the due date from the date requested by the CLEC for:
 - (1) orders that were entirely processed electronically; and
 - (2) orders that were processed partially or entirely with manual intervention.

- (b) the reason or reasons for such modification and, for each such reason, the number of orders on which the due date was modified for that reason;
- (c) the number of orders by which the due date requested by the CLEC was modified by:
 - (1) one day;
 - (2) two days;
 - (3) three days;
 - (4) five days;
 - (5) six or more days.

24. State whether BellSouth has agreed, or committed itself, to provide firm order confirmations (FOCs) to CLECs within a specified time interval. If your answer is in the affirmative, describe the time interval by order type and service.

25. To the extent that BellSouth has agreed to provide FOCs within a specified time interval after receipt of an order by a CLEC, state the number of FOCs (both the total number and separately for resale and for unbundled network elements) that have been transmitted since January 1, 1997, to the CLECs:

- (a) within that interval or no later than 24 hours after that interval;
- (b) more than 24 hours, but less than 48 hours, after that interval;
- (c) more than 48 hours, but less than 72 hours, after that interval;
- (d) 72 or more hours after that interval.

As part of your response, identify all documents that were reviewed, consulted, or relied upon in providing the above-requested data.

26. Identify, both for Tennessee and for the BellSouth region, the total number of CLEC orders completed since January 1, 1997 for which the notice of order completion (or "865") was transmitted to the CLEC:

- (a) within 24 hours after completion of the order;
- (b) more than 24 hours, but less than 48 hours, after completion of the order;
- (c) more than 48 hours, but less than 72 hours, after completion of the order;
- (d) 72 or more hours after completion of the order.

27. Identify in detail all studies, reports, analyses and logs from which one can determine the number and percentage of all CLEC orders since January 1, 1997 for which notices of order completion were returned to the CLEC more than 24 hours after completion of the order.

28. State, with respect to all CLEC orders completed to date (and separately for resale and for unbundled network elements), the number and percentage of such orders that were completed by

BellSouth, both for Tennessee and for the BellSouth region:

- (a) on or before the due date specified on the service order;
- (b) after the due date specified on the service order, but within 24 hours after that due date;
- (c) more than 24 hours, but less than 48 hours, after the due date specified on the service order;
- (d) more than 48 hours, but less than 72 hours, after the due date specified on the service order; and
- (e) more than 72 hours after the due date specified on the service order.

As part of your response, describe the methodology by which the numbers and percentages were calculated, and describe the extent to which BellSouth excluded any orders from its analysis (for example, orders rejected by BellSouth's systems upon their original submission, pending orders that are already past their due dates, or orders with customer-requested due dates that were modified by BellSouth).

29. State, with respect to all CLEC orders completed since January 1, 1997 (and separately for resale and for unbundled network elements), both for Tennessee and for the BellSouth region, the number and percentage of such orders that were completed by BellSouth:

- (a) on or before the due date specified on the FOC;
- (b) after the due date specified on the FOC, but within 24 hours after that due date;
- (c) more than 24 hours, but less than 48 hours, after the due date specified on the FOC;
- (d) more than 48 hours, but less than 72 hours, after the due date specified on the FOC; and
- (e) more than 72 hours after the due date specified on the FOC.

As part of your response, describe the methodology by which the numbers and percentages were calculated, and describe the extent to which BellSouth excluded any orders from its analysis (for example, orders rejected by BellSouth's systems upon their original submission, pending orders that are already past their due dates, or orders with customer-requested due dates that were modified by BellSouth).

30. Of the total number of CLEC orders submitted since January 1, 1997 where BellSouth claims that the due dates on such orders were met, state the number of such orders that were initially rejected by BellSouth's systems, or identify documents from which that number can be calculated, both for Tennessee and for the BellSouth region.

31. With respect to the notices of completion sent by BellSouth to the CLECs for Tennessee and the BellSouth region, state:

- (a) whether the "completion date" set forth on such notices has always been the date on which the service was actually completed, as opposed to other dates (such as the "CPX" date); and
 - (b) if your answer is in the negative, describe what other date has been used as the "completion date" on that notice, and the time period during which that date was so used.

- 32.
 - (a) To the extent that BellSouth has processed CLEC service orders manually since January 1, 1997, state (both for the entire BellSouth region and for Tennessee) the percentage of such orders for which due dates were met, and the percentage of such orders for which due dates were not met.
 - (b) Identify all documents that describe such percentages, or from which such percentages can be determined.
 - (c) State whether, with respect to the percentages of due dates met provided in response to sub-part (a) BellSouth excluded any orders from consideration in its analysis (for example, orders rejected by BellSouth's systems upon their original submission, pending orders that are already past their due dates, or orders with customer-requested due dates that were modified by BellSouth).

- 33.
 - (a) With respect to CLEC orders that BellSouth has processed without manual or human intervention since January 1, 1997, state (both for the entire BellSouth region and for Tennessee) the percentage of such orders for which due dates were met, and the percentage of such orders for which due dates were not met.
 - (b) Identify all documents that describe such percentages, or from which such percentages can be determined.

- 34. State the average response times (both for Tennessee and for the BellSouth region) for each of the pre-ordering transactions by CLECs using the LENS interface, and the percentages of such pre-ordering transactions for which the response time have been less than 5 seconds, less than 10 seconds, and less than 60 seconds.

- 35. State the average response time (both for Tennessee and for the BellSouth region) that is required for BellSouth's service representatives to complete the pre-ordering transactions that are performed by CLECs (i.e., street address validation, telephone number information, services and features information, due date information, and customer service record information).

- 36.
 - (a) Identify all OSS interfaces that BellSouth has made available to CLECs and that are presently operational.

- (b) Identify all BellSouth interfaces that CLECs are currently using and, for each such interface, identify the number and names of all CLECs using the interface.
- 37.
 - (a) Identify each CLEC that has requested use of EC Lite.
 - (b) Identify each CLEC that is currently using EC Lite.
 - (c) Identify each CLEC that plans to use the current version of EC Lite.
- 38.
 - (a) Identify each CLEC that has requested use of CGI to connect electronically to the LENS interface.
 - (b) Identify each CLEC that is currently using CGI to connect electronically to the LENS interface.
 - (c) Identify each CLEC that plans to use the current version of CGI to connect electronically to the LENS interface.
- 39. Identify each interface that BellSouth intends to make available to CLECs that is not currently operational, and the date on which each such interface is expected to be ready.
- 40. Describe the average service interval for switching a retail customer's interexchange carrier PIC selection.
- 41. State whether BellSouth measures or reports, or maintains data or documents from which one could determine, average installation intervals (for Tennessee and for the BellSouth region) for:
 - (a) BellSouth's retail operations;
 - (b) individual resellers;
 - (c) all resellers combined.
- 42. If your answer to any or all of Interrogatory No. 41 is in the affirmative:
 - (a) Describe how BellSouth measures or calculates average installation intervals (i.e., what BellSouth defines as the beginning of the interval and the end of the interval).
 - (b) Identify all documents that set forth such intervals, and all documents from which such intervals can be determined, including but not limited to reports, analyses, studies, or memoranda.
 - (c) Describe the average installation interval for BellSouth's retail operations since January 1, 1997:

- (1) by month;
 - (2) to date;
 - (3) by any other time period that BellSouth uses to measure average installation intervals.
- (d) Describe the average installation interval for resale, both in Tennessee and on a regionwide basis, since January 1, 1997, both individually and on an aggregated basis:
- (1) by month;
 - (2) to date;
 - (3) by any other time period that BellSouth uses to measure average installation intervals.

In providing the installation intervals requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

43. To the extent that BellSouth identifies average installation intervals in response to Interrogatory No. 42:

- (a) State whether BellSouth excluded from such data those customers who requested due dates beyond the first available due date.
- (b) State whether BellSouth disaggregated its data to account for the impact that different types of services may have on the average installation interval.
- (c) State whether, and to what extent, any inconsistencies between average installation intervals for BellSouth's retail operations and those for other carriers are attributable to due dates not met.

44. State whether BellSouth measures or reports, or maintains data or documents from which one could determine, average installation intervals for loops (in the aggregate, and for individual CLECs who have purchased, leased or used unbundled loops) and other unbundled network elements, for Tennessee and for the BellSouth region.

45. If your answer to any or all of Interrogatory No. 44 is in the affirmative:

- (a) Describe how BellSouth measures average installation intervals for loops and other unbundled network elements (i.e., what BellSouth defines as the beginning of the interval and the end of the interval).
- (b) Identify all documents that set forth such intervals, and all documents from which such intervals can be determined, including but not limited to any reports, analyses, studies, or memoranda.
- (c) Describe the average installation interval for loops, and separately for each other individual unbundled network element, since January 1, 1997:

- (1) by month;
- (2) to date;
- (3) by any other time period that BellSouth uses to measure average installation intervals.

In providing the installation intervals requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

46. To the extent that BellSouth identifies average installation intervals in response to Interrogatory No. 45:

- (a) State whether BellSouth excluded from such data those customers who requested due dates beyond the first available due date.
- (b) State whether BellSouth disaggregated its data to account for the impact that different types of services may have on the average installation interval.
- (c) State whether, and to what extent, any inconsistencies between average installation intervals for BellSouth's retail operations and those for loops are attributable to due dates not met.

47. Provide, for the period beginning January 1, 1997, the following comparative performance information both for BellSouth's retail operations and with respect to unbundled network elements purchased, leased, or used by CLECs:

- (a) Trouble report rates;
- (b) Receipt to restore;
- (c) Out of service over 24 hours;
- (d) Any other information maintained by BellSouth that compares BellSouth's performance with respect to unbundled network elements to BellSouth's retail operations.

In providing the comparative performance information requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

48. Provide, for the period beginning January 1, 1997:

- (a) the average time required to return a FOC after submission of the order, compared to the average time required until an order placed by a BellSouth retail representative is recognized as valid by BellSouth's legacy systems;
- (b) the percentage of jeopardy notices received prior to expiration of the original due date, compared to the percentage of times BellSouth is able to notify its own retail

- (c) customers of a changed due date, prior to expiration of the original due date; the average time that is required to return rejection notices after submission of an order, compared to the average time until an order placed by a BellSouth service representative is recognized as invalid by BellSouth's legacy systems.

In providing the comparative performance information requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to make meaningful comparisons.

49. Provide, for the period beginning January 1, 1997, performance information that compares BellSouth's retail operations with resale. Such information includes, but is not limited to:

- (a) the extent to which BellSouth completes the installation of service on or before the date set forth on the Firm Order Confirmation notice;
- (b) the extent to which BellSouth completes the installation of service on or before the due date requested by a CLEC or a CLEC customer;
- (c) the extent to which orders are rejected by BellSouth's systems;
- (d) trouble report rates;
- (e) receipt to restore times;
- (f) mean time to repair;
- (g) out of service over 24 hours; and
- (h) timeliness of delivery of daily usage information for customer billing.

In providing the comparative performance information requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to make meaningful comparisons.

50. Describe the service order accuracy rate for CLEC orders received and the service order accuracy rate for BellSouth's retail operations, since January 1, 1997, for Tennessee and the BellSouth region. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders may be defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs. In providing this information, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated to permit meaningful comparisons.

51. State whether BellSouth maintains data on held orders in its retail operations and for orders submitted by CLECs, for Tennessee and for the BellSouth region. To the extent that BellSouth maintains such data:

- (a) Describe the criteria and methodology used to calculate the number and percentage of held orders;

- (b) Identify the number of such held orders since January 1, 1997, by month, and by any other time period used by BellSouth to calculate held orders.

In providing the held order information requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

52. State whether BellSouth maintains data on provisioning accuracy, or maintains data or documents from which provisioning accuracy may be determined, for the period beginning January 1, 1997, either for its retail operations or with respect to orders submitted by CLECs, for Tennessee and for the BellSouth region. For purposes of this interrogatory, "provisioning accuracy" may be defined as the percentage of end user customers who received the service that they ordered.

53. If your answer to Interrogatory No. 52 is in the affirmative, describe the provisioning accuracy rate for BellSouth's retail operations, and the provisioning accuracy rate for orders submitted by CLECs, since January 1, 1997, by month and by any other time period used by BellSouth to calculate provisioning accuracy. In providing the provisioning accuracy information requested herein:

- (a) Describe the extent to which the percentage includes customers who experienced failures in new service within 7 days, or 30 days, of installation;
- (b) Use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

54. Describe the extent to which BellSouth maintains data on:

- (a) Bill quality, timeliness, and accuracy for BellSouth's own retail operations;
- (b) Bill quality, timeliness, and accuracy with respect to users of unbundled network elements;
- (c) Bill quality, timeliness, and accuracy with respect to resellers of local exchange service.

55. To the extent that BellSouth maintains data on bill quality, timeliness, and accuracy, provide such data for the period beginning January 1, 1997, both for Tennessee and for the BellSouth region, for:

- (a) BellSouth's own retail operations;
- (b) users of unbundled network elements;
- (c) resellers of local exchange service.

In providing the information requested herein, use performance measurements that are clearly

defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

56. State whether BellSouth calculates, or has data or documents from which one can determine, the rate of repeat trouble reports for BellSouth's retail operations, users of unbundled network elements, or for resellers and customers of resellers, for Tennessee and for the BellSouth region. For purposes of this interrogatory, "repeat trouble reports" refers to the number and percentage of customers who experienced more than 1 trouble in the current and/or previous month, or the percentage of repeat trouble reports on the same line received within 30 days, or any other measure used by BellSouth to measure repeat trouble reports.

57. If your response to any or all of Interrogatory No. 56 is in the affirmative:

- (a) Describe repeat trouble reports for:
 - (1) BellSouth's retail operations;
 - (2) unbundled network elements;
 - (3) resale.
- (b) Describe the methodology used by BellSouth to calculate the rate and number of repeat trouble reports.

In providing the repeat trouble report information requested herein, use performance measurements that are clearly defined, permit comparisons with BellSouth's retail operations, and are sufficiently disaggregated by service and activity to permit meaningful comparisons.

58. With respect to any testing (whether external or internal testing) conducted by BellSouth of the interfaces that it provides to CLECs, describe for each such interface and each such test:

- (a) the date(s) on which the test was conducted;
- (b) the type of test performed;
- (c) the specific objectives of the test;
- (d) the results that BellSouth intended to achieve;
- (e) the methodology used to perform the test;
- (f) the types of service orders that were used in the test;
- (g) the types of services and products that were the subject of the test;
- (h) the results of the test (including a description of what the test results measured and how the measurements were defined);
- (i) any changes that were made in the interface following the test, as a result of the test.

59. Describe any performance standards, measurements, and reporting mechanisms that BellSouth uses or will use to monitor its performance in processing the orders submitted by CLECs, as opposed to its performance in processing orders in its own retail operations, and the quality, reliability, and timeliness of its OSS functions.

60. To the extent that BellSouth maintains data on the backlog of orders in its own retail operations, and on the backlog of orders submitted by CLECs:

- (a) Describe how such data is maintained.
- (b) Describe how BellSouth defines "backlog."
- (c) Describe, for the period beginning January 1, 1997:
 - (1) the number and percentage of backlogged orders for BellSouth's retail operations;
 - (2) the number and percentage of backlogged orders for all CLECs;
 - (3) the number and percentage of backlogged orders for all resellers of local exchange service;
 - (4) the number and percentage of backlogged orders for all users of unbundled network elements.

61. To the extent that BellSouth manually processes orders submitted by CLECs:

- (a) State whether, and to what extent, the manual processing varies among particular resellers.
- (b) State whether, and to what extent, the manual processing varies among particular users of unbundled network elements.
- (c) State whether, and to what extent, the manual processing varies as between resellers generally and users of unbundled network elements generally.
- (d) State whether, and to what extent, the manual processing varies among particular services or products that are ordered.

62. State whether BellSouth maintains data that describes, by CLEC, the time BellSouth takes to provision service for that CLEC. If your answer is in the affirmative, identify:

- (a) The provisioning time for AT&T, as opposed to the provisioning time by other CLECs.
- (b) Any reports, analyses, studies, memoranda or other documents that describe the provisioning times for individual CLECs.

63. State whether BellSouth calculates the number and/or percentage of orders submitted by CLECs that are rejected by BellSouth's systems at least once or more before they are ultimately provisioned by BellSouth.

- (a) If your answer is in the affirmative, describe the number and percentage of CLEC orders so rejected since January 1, 1997, by month both for Tennessee and for the entire region, and identify the method used by BellSouth to calculate the number and percentage of such rejected orders.
- (b) If your answer is in the negative, identify all documents from which such

numbers and percentages can be calculated.

64. State for the period beginning January 1, 1997, the average time that BellSouth takes to send a rejection notice when an order is rejected by BellSouth's systems, for:

- (a) all rejected CLEC orders;
- (b) rejected CLEC orders for resale;
- (c) rejected CLEC orders for unbundled network elements.

65. Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, that can be ordered using each of the following interfaces:

- (a) EDI;
- (b) EXACT;
- (c) LENS;
- (d) API Gateway.

66. Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, for which maintenance and repair services can be ordered using the following interfaces:

- (a) TAFI;
- (b) EBI.

67. Describe how BellSouth determines the order in which it provides service to its own retail customers. To the extent that BellSouth does not provide service strictly on a first-come, first-served basis, describe:

- (a) the circumstances, class of service, or class of customers that are served on other than a first-come, first-served basis;
- (b) the extent that BellSouth gives some customers or services priority, precedence or preference over others in terms of the installation or repair of service, including the reasons for any such prioritizing, precedence, or preference;
- (c) the extent to which BellSouth has an established system for assigning some customers or services priority, preference or precedence over others in the installation or repair of service, including the assignment of codes to designate such prioritized, preferenced, or preferred customers or services.

68. State whether BellSouth has retained or otherwise requested any outside consultant, or any other independent third party, to study, evaluate, review, or analyze the performance and/or capacity of its operations support systems, including interfaces, the access that BellSouth provides to its OSS for CLECs, and the performance of BellSouth personnel (including the

BellSouth Local Carrier Service Center) who process orders submitted by CLECs. If your answer is in the affirmative, identify:

- (a) the name(s) of the outside consultant(s) or other independent evaluators;
- (b) the date on which the consultant(s) was initially contacted by BellSouth concerning each study, evaluation, review, or analysis;
- (c) the nature, scope, and purpose of each study, evaluation, review, or analysis that was conducted;
- (d) the date(s) on which agreement was reached for the consultant(s) to undertake each study, evaluation, review, or analysis;
- (e) the proposed and actual beginning and end dates of each study, evaluation, review, or analysis;
- (f) the results of each study, evaluation, review, or analysis;
- (g) any reports or other documents prepared by the outside consultant(s) or independent evaluator(s), in connection with each study, evaluation, review, or analysis; and
- (h) any concerns, problems, deficiencies, recommendations or areas needing improvement that the consultant(s) identified with respect to BellSouth's OSS, including but not limited to concerns, problems, deficiencies, or areas that need improvement with respect to (1) capacity, (2) parity of access for CLECs, (3) testing, (4) mechanization of interfaces, (5) manual intervention, (6) human error, (7) performance measurement, (8) speed, (9) quality, and (10) ease of use.

69. State whether BellSouth has provided AT&T with all of the specifications and business rules necessary to instruct AT&T on how to modify or design its systems in a manner that will enable it to communicate with BellSouth's legacy systems and interfaces and to minimize manual intervention. If your answer is in the negative, state the reasons why BellSouth has not provided such specification or rules.

70. For each UNE and resale product offered by BellSouth, state the date(s) when BellSouth's OSS will conform to OBF and other industry standards for pre-ordering, ordering, provisioning, repair/maintenance, and billing.

71. Describe in detail the BellSouth service intervals that will be used in determining whether BellSouth's loop cut-over intervals for CLECs are nondiscriminatory, including but not limited to how the intervals are measured and the average interval in which BellSouth initiates new local service for a retail customer (describe the various permutations of loop cut-overs performed in the central office, including "win-back" customers).

72. Describe in detail the manner in which BellSouth intends to provision UNEs in Tennessee in a manner that allows competing carriers to combine them to provide telecommunications services as required by § 251(c)(3) of the Act, and identify with specificity

the location in BellSouth's SGAT such information is contained. In addition, please identify all combinations of UNEs which BellSouth intends to physically separate before provisioning to CLECs? For each, explain in detail BellSouth's proposed methods and procedures for separating the elements and for allowing CLECs to combine the elements.

73. Which UNEs does BellSouth propose be combined by CLECs in a collocated space? For all other UNEs, describe the manner in which BellSouth intends to provision such UNEs to allow carriers to combine them to provide telecommunications services as required under § 251(c)(3) of the Act.

74. Which UNEs will BellSouth permit CLECs to combine without using collocated space?

75. For each combination of UNEs that BellSouth will physically separate before provisioning to CLECs, explain in detail BellSouth's proposal for maintenance of the combined UNEs.

76. What components of BellSouth's network are currently combined through electronic connections made from remote locations?

77. Can BellSouth make a software change from a remote location to dedicate the traffic of a specific end user to reserved capacity on a specific trunk?

78. Do BellSouth's CENTREX end users have the capacity to activate and deactivate lines from remote locations?

79. Can BellSouth make a software change from a remote location that disconnects service on a loop for one customer, and then reestablishes service on the same loop for a second customer?

80. Describe, on an itemized basis, all charges CLECs must incur that are associated with BellSouth's proposal to allow CLECs to combine the loop and switch through collocation.

81. Under BellSouth's proposal to allow CLECs to combine the loop and switch through collocation, what if any pre-wiring by CLECs will BellSouth permit at (i) the main distribution frame ("MDF"); (2) the intermediate distribution frame ("IDF"); and (3) in the CLEC's collocated space?

82. Under what circumstances, if any, will BellSouth permit CLEC technicians or a BellSouth approved vendor acting on a CLEC's behalf to have direct access to the BellSouth MDF?

83. Under BellSouth's proposal to allow CLECs to combine the loop and switch through collocation, what work will be performed by (1) BellSouth technicians; (2) CLEC technicians;

(3) third-party vendors?

84. Where CLECs request collocated space solely for the purpose of loop/switch combination, will BellSouth require use of a POT frame? If so, for what purpose(s)? If so, will BellSouth require a cross-connection at the POT frame?

85. Where CLECs request collocated space solely for the purpose of loop/switch combination, will BellSouth require use of an IDF?

86. Describe in detail any BellSouth proposals to maintain service continuity and minimize service disruption during cutover of customer service to a CLEC that provides service via loop and switch combinations, including any supplementary charges that BellSouth proposes for minimizing service disruption.

87. Assuming a CLEC has pre-wired loop and switch connections in its collocation space to blocks on the MDF or IDF, what is the average expected duration of service outage for conversion of an existing BellSouth customer to a UNE-combination CLEC customer? Describe in detail all assumptions underlying this estimate.

88. Describe any testing or studies that BellSouth has undertaken or commissioned to determine the average expected duration of service outages for conversion of an existing BellSouth customer to a UNE-combination CLEC customer. Describe the results of any such testing or studies.

89. What additional costs, if any, must a CLEC incur to obtain (1) a coordinated cutover of service; (2) a cutover of service, coordinated or not, after 5:00 p.m. and before 8:00 a.m.?

90. Where the additional loop length caused by collocation requires loop conditioning, who will be responsible for the conditioning? When and how will such conditioning be done?

91. What is BellSouth's proposal to ensure engineering records are updated to reflect new loop lengths?

92. What other engineering records will BellSouth access or modify to separate already combined elements, and to allow CLECs to complete recombination of UNEs? What is BellSouth's proposal to accurately maintain such records?

93. Will BellSouth recalibrate the MLT capabilities of the switch to account for the additional loop length introduced by collocation?

94. Will BellSouth provide CLECs access to the engineering records that are accessed or modified in connection with the separation and recombination of UNEs?

95. When trouble is reported on the line of a CLEC UNE-combination customer, what methods or procedures does BellSouth propose for responding?
96. What is the maximum number of loop/switch combination orders that BellSouth will be able to provision in a single central office per day? Explain in detail all of the assumptions underlying this estimate, including but not limited to the size of the central office, the number of technicians needed to complete one order, the number of technicians working simultaneously on the MDF, the number and length of working shifts per day, and the number of central offices at which provisioning could occur on the same day at such a level.
97. Describe any testing or studies that BellSouth has undertaken or commissioned to determine the maximum number of loop/switch combination orders that BellSouth could provision in a single central office per day. Describe the results of any such testing or studies.
98. What is the greatest number of loop/switch combinations that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in the BellSouth region?
99. What is the greatest number of unbundled loops that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in the BellSouth region?
100. What is the average number of cross-connections on an MDF that BellSouth currently completes in a central office per day? Describe in detail the basis for this response.
101. Will BellSouth require AT&T and other CLECs to execute a "Master Collocation Agreement" or other agreement(s) before BellSouth will make collocation available to AT&T and other CLECs?
102. Are there any modifications needed to AT&T's interconnection agreements, in Tennessee, and throughout the BellSouth region, before BellSouth will make collocation available to AT&T? If so, what are they?
103. Where there is inadequate space in a central office to accommodate a CLEC's physical collocation request, how will BellSouth allow CLECs to combine loops and switches?
104. Will BellSouth permit CLECs requesting collocation space solely for purposes of combining or recombining UNEs to obtain less than 100 square feet of space? If yes, how will BellSouth adjust its existing charges for collocated space?
105. Will BellSouth offer CLECs seeking to combine UNEs a choice of either physical or virtual collocation, or will virtual collocation be made available only where there is inadequate space for physical collocation?
106. If virtual collocation is used, what is BellSouth's proposal to allow CLECs to combine the

loop and switch through this arrangement?

107. How many central offices, including remote switching locations, does BellSouth have, both in Tennessee, and throughout the BellSouth region? In your answer, state separately the number of remote switching locations both in Tennessee, and throughout the BellSouth region.

108. List each central office, in Tennessee and on a region-wide basis, where BellSouth anticipates it will be unable to accommodate requests for physical collocation.

109. How many physical and virtual collocation arrangements can BellSouth complete per month, in Tennessee, and on a regionwide basis? Explain in detail all of the assumptions underlying this estimate, including any limitations on number of collocation applications BellSouth can accommodate per month in a given geographic region.

110. Describe any intervals to which BellSouth has committed for the provision of collocated space, and to which CLECs the commitments have been made. Describe what remedies are available to CLECs if the committed intervals are not met.

111. Describe any testing or studies that BellSouth has undertaken or commissioned to determine whether it can meet its committed intervals for provision of collocated space. Describe in detail the results of any such testing or studies.

112. How many requests for physical collocation has BellSouth received in Tennessee and in the BellSouth region as a whole?

113. How many physically collocated spaces has BellSouth completed, in Tennessee and in the BellSouth region as a whole?

114. How many requests for virtual collocation has BellSouth received in Tennessee and in the BellSouth region as a whole?

115. How many virtually collocated spaces has BellSouth completed, in Tennessee and in the BellSouth region as a whole?

116. Will BellSouth allow a CLEC to collocate in a remote switching site that houses a BellSouth remote switching module?

117. List all remote switching sites in Tennessee and on a region-wide basis that cannot currently accommodate one physical collocation space.

118. List all remote switching sites in Tennessee and on a region-wide basis that cannot currently accommodate more than one physical collocation space.

119. Describe in detail how BellSouth will provision individual loops for combination with switches where the individual loops are currently provisioned using integrated digital loop carriers ("IDLC")? Does BellSouth expect that all of its IDLC customers can be switched over to UNE-combination CLECs using the above described method(s)? If not, what percentage of IDLC customers does BellSouth expect to be able to switch over using the method(s) described above?

120. To the extent that BellSouth proposes to switch over IDLC customers to UNE-combination CLECs by reconnecting the customer's loop to an analog line:

- (a) state whether spare analog facilities will be available for every IDLC customer;
- (b) state whether the customer's service quality will be degraded by the conversion to an analog line;
- (c) provide an estimate of the cost of converting the loop to an analog line;
- (d) provide an estimate of the average customer service outage incurred during the conversion to an analog line;
- (e) Describe in detail the basis for your responses to (a) - (d).

121. What percentage of BellSouth loops are currently provisioned using IDLC, in Tennessee, and throughout the BellSouth region? What percentage of BellSouth's customers in Tennessee does BellSouth anticipate serving by IDLC by the year 2000? By the year 2003?

122. May CLECs purchase at a UNE price interoffice transport shared with BellSouth?

123. Will BellSouth require CLECs to recombine signaling and switching? If so, describe BellSouth's proposal.

124. Will BellSouth require CLECs to recombine switching and interoffice transport? If so, describe BellSouth's proposal.

125. Will BellSouth require CLECs to recombine signaling and databases? If so, describe BellSouth's proposal.

126. Will BellSouth require CLECs to recombine switching and databases? If so, describe BellSouth's proposal.

127. Will BellSouth require CLECs to recombine switching and OSS? If so, describe BellSouth's proposal.

128. Will BellSouth require CLECs to recombine switching and OS/DA? If so, describe BellSouth's proposal.

129. Has BellSouth investigated any alternatives to collocation for the combination of network elements? If so, please describe these alternatives and explain BellSouth's reasons for not making these alternatives available to CLECs prior to this date. If not, when will any such investigation be done?

130. Will BellSouth permit CLECs to purchase UNEs as they are already combined in BellSouth's network, at individual UNE prices plus an additional "glue charge?" If so, how does BellSouth propose to calculate that charge? If not, why not?

131. Will BellSouth permit CLECs to recombine the loop and switch through "direct separation and recombination," i.e., by directly disconnecting and reconnecting (through ILEC and CLEC technicians or a third party vendor) the cross-connect at the MDF? If not, why not?

132. Will BellSouth permit CLECs to recombine the loop and switch through the use of permanently-installed pre-wired CLEC connector blocks on the MDF that would permit cross-connections to be performed directly at the MDF, rather than in collocated space? If not, why not?

133. Will BellSouth permit CLECs to recombine the loop and switch through the use of an electronic cross-connect system? If not, why not?

134. Will BellSouth permit CLECs to recombine the loop and switch through use of the "recent change" process? If not, why not?

135. If the information requested in Document Request Nos. 55 and 56 is not currently available, specify when such data will be available to CLECs and describe the approach BellSouth used to develop the data warehouse without such documentation being available for internal purposes.

DOCUMENT REQUESTS

1. Produce copies of all documents that discuss the status of orders received from CLECs by BellSouth from January 1, 1997 to the present, for Tennessee and for the BellSouth region. For purposes of this request, "status" includes, for a particular time period:

- (a) the number of CLEC orders completed;
- (b) the number of CLEC orders pending; and

- (c) the number of CLEC orders rejected.
2. Produce copies of all documents that relate to the performance of LCSC operations, including but not limited to "LCSC Weekly Operations Reports."
 3. For any orders for unbundled loops that BellSouth has received from CLECs (both in Tennessee and region-wide) since February 8, 1996, produce a copy of each manual or electronic order form received or prepared by BellSouth documenting CLEC orders of unbundled loops since February 8, 1996.
 4. For any orders for basic service lines at a wholesale discount (i.e., Total Service Resale, or "TSR" orders) received by BellSouth (both in Tennessee and region-wide) since February 8, 1996, produce a copy of each manual or electronic order form received or prepared by BellSouth documenting CLEC orders for basic service lines at a wholesale discount since February 8, 1996.
 5. Produce copies of all quarterly reports (and reports for any other time period) which have been prepared (or were in draft) for CLECs (or for internal use) reflecting BellSouth's performance in installing and maintaining interconnection arrangements for unbundled elements and resold services since February 8, 1996, both in Tennessee and region-wide.
 6. Produce copies of documents sufficient to show, for the entire BellSouth region and for each State in that region, for each day since February 8, 1996:
 - (a) the number of orders for unbundled loops that were received from all CLECs combined;
 - (b) the number of orders for unbundled loops from all CLECs combined that were processed;
 - (c) the number of orders for unbundled loops from all CLECs combined that were rejected;
 - (d) the number of orders for resold local lines from all CLECs combined that were received;
 - (e) the number of orders for resold local lines from all CLECs combined that were processed;
 - (f) the number of orders for resold local lines from all CLECs combined that were rejected.
 7. With respect to the joint testing of the Phase I Electronic Data Interchange ("EDI") interface that BellSouth has conducted jointly with AT&T, produce copies of:
 - (a) all documents that discuss the end-to-end testing of the Phase I interface, including the results of that testing;
 - (b) all documents that discuss the service readiness testing of the Phase I interface, including the results of that testing to date;

- (c) all documents that discuss the market readiness testing of that interface, including the results of such testing to date.
8. Produce copies of all documents that discuss any testing that BellSouth has performed to date, either internally within BellSouth or jointly with another CLEC (including, but not limited to, test agreements, test plans, interim or final test results, and any documents summarizing or analyzing any test results), of any of the following interfaces, both in Tennessee and region-wide:
- (a) Local Exchange Navigation System ("LENS");
 - (b) EDI;
 - (c) Exchange Access Control and Tracking System ("EXACT"), to the extent that the testing involved the use of EXACT to order interconnection trunking or unbundled network elements;
 - (d) Trouble Analysis Facilitation Interface ("TAFI"), to the extent that the testing involved the actual or possible use of TAFI by CLECs;
 - (e) the electronic bonding interface ("EBI") currently used by interexchange carriers for access services, to the extent that the testing involved the actual or possible use of EBI by CLECs;
 - (f) the Billing Daily Usage File;
 - (g) EC Lite;
 - (h) API Gateway;
 - (i) any other interface that BellSouth offers or provides to CLECs.
9. Produce copies of all documents, including reports or logs, that describe (or from which one can determine), by month from January 1997 to date (both in Tennessee and region-wide):
- (a) the total number of CLEC orders rejected by BellSouth's systems;
 - (b) the percentage of the total number of rejected CLEC orders to the total number of orders submitted by CLECs;
 - (c) the reasons for such rejections;
 - (d) the number of notices of rejection that were returned:
 - (i) within 24 hours of receipt of the corresponding CLEC orders;
 - (ii) more than 24 hours, but less than 48 hours, after receipt of the corresponding CLEC orders;
 - (iii) more than 48 hours, but less than 72 hours, after receipt of the corresponding CLEC orders;
 - (iv) more than 72 hours after receipt of the corresponding CLEC orders.
10. Produce copies of any documents, analyses, or logs prepared or maintained by BellSouth since January 1, 1997 in connection with CLEC orders (testing or customer) that have remained pending, "in process" or "in error" beyond the requested or committed due date, both in Tennessee and region-wide.
11. Produce copies of all documents, information, and materials (whether paper, electronic or

any other form) that BellSouth witnesses review, consider or rely upon in connection with the preparation of any testimony related to OSS that is submitted in this docket.

12. To the extent that BellSouth has manually processed orders for BellSouth retail customers, both in Tennessee and region-wide, please produce copies of all such orders so manually processed since January 1, 1997.

13. Produce copies of all information, data, studies, analyses, reports, summaries or other documents relied on by any witness for BellSouth in this proceeding, or any other State Section 271 proceeding, in support of BellSouth's position that CLECs are being provided access to BellSouth's operations support systems and functions on parity with the access that is being provided to BellSouth's own retail business units.

14. Produce copies of documents sufficient to describe the time intervals within which BellSouth has committed or agreed to complete the requested service after receiving a service order submitted by a CLEC, by order type, both in Tennessee and region-wide.

15. Produce copies of any reports, analyses, or logs from which one can determine the number of orders received from CLECs (both in Tennessee and region-wide):

- (a) where the due date on the order was changed by BellSouth;
- (b) where the completion date was later than the due date on the firm order confirmation ("FOC" or "855") transmitted to the CLEC by BellSouth.

16. Produce copies of any reports, studies, analyses, or logs from which one can determine the number and percentage of CLEC orders, in relation to the total number of CLEC orders, for which the FOC was transmitted to the CLEC more than 24 hours after receipt of the order from the CLEC since January 1, 1997, both in Tennessee and region-wide.

17. Produce copies of all analyses, reports, studies, or logs that describe, or from which one could determine, with respect to CLEC orders completed since January 1, 1997 (both in the aggregate and separately for resale and for unbundled network elements) both in Tennessee and region-wide:

- (a) the number of CLEC orders for which the service was completed on or before the due date specified on the service order;
- (b) the number of CLEC orders for which the service was completed after the due date specified on the service order;
- (c) the number of CLEC orders for which the service was completed:
 - (i) within 24 hours after the due date specified on the service order;
 - (ii) more than 24 hours, but less than 48 hours, after the due date specified on the service order;
 - (iii) more than 48 hours, but less than 72 hours, after the due date specified on

- the service order; and
- (iv) more than 72 hours after the due date specified on the service order.

18. Produce copies of all studies, analyses, reports, or logs that describe, or from which one can determine, with respect to CLEC orders completed since January 1997 (both in the aggregate and separately for resale and for unbundled network elements), both in Tennessee and region-wide:

- (a) the number of CLEC orders completed on or before the due date specified on the FOC;
- (b) the number of CLEC orders completed after the due date specified on the FOC;
- (c) the number of CLEC orders completed:
- (d) within 24 hours of the due date specified on the FOC;
- (e) more than 24 hours, but less than 48 hours, after the due date specified on the FOC;
- (f) more than 48 hours, but less than 72 hours, after the due date specified on the FOC;
- (g) more than 72 hours after the due date specified on the FOC.

19. Produce copies of the supporting documentation (including, but not limited to, calculations) of the capacity figures for each BellSouth interface as described in the testimony of BellSouth's witnesses in this proceeding. This should include, but is not limited to, (i) all CLEC demand forecasts; and (ii) all documentation on any stress tests done that show the tested operating capacity and the quantity of hardware in place to currently handle the capacity levels shown.

20. Produce copies of all documents related to IBM's review of BellSouth's OSS stress testing.

21. Produce copies of all documents that describe any problems with the interfaces offered to CLECs by BellSouth, any defects in those interfaces, malfunctions of those interfaces, or complaints by CLECs concerning BellSouth's interfaces, including but not limited to any problem logs.

22. Produce copies of all studies, reports, analyses and logs from which one can determine the number and percentage of all CLEC orders since January 1, 1997 for which notices of order completion were returned to the CLEC more than 24 hours after the actual completion of the order.

23. To the extent that BellSouth has processed CLEC service orders manually since January 1, 1997, produce copies of all documents that describe (for the entire BellSouth region or for each State in the region) the percentage of such orders for which due dates were met (or not met),

or from which such percentages can be determined.

24. To the extent that BellSouth has processed CLEC orders without manual or human intervention since January 1, 1997, produce copies of all documents that describe the percentage of such orders for which due dates were met (or not met), or from which such percentages can be determined.

25. Produce copies of all documents that describe, or from which one can calculate, the average installation intervals since January 1, 1997 for:

- (a) BellSouth's retail operations;
- (b) resale;
- (c) loops;
- (d) any other unbundled network elements;
- (e) individual resellers;
- (f) individual CLECs who have purchased, leased, or used unbundled loops or other unbundled network elements.

26. Produce copies of all documents that set forth, or from which one can determine, performance information that compares BellSouth's retail operations with resale. Such information includes, but is not limited to:

- (a) the average time required to return a FOC after submission of the order, compared to the average time required until an order placed by a BellSouth retail representative is recognized as valid by BellSouth's legacy systems;
- (b) the percentage of jeopardy notices received prior to expiration of the original due date, compared to the percentage of times BellSouth is able to notify its own retail customers of a changed due date, prior to expiration of the original due date;
- (c) the average time that is required to return rejection notices after submission of an order, compared to the average time until an order placed by a BellSouth service representative is recognized as invalid by BellSouth's legacy systems;
- (d) the extent to which BellSouth completes the installation of service on or before the date set forth on the Firm Order Confirmation notice;
- (e) the extent to which BellSouth completes the installation of service on or before the due date requested by a CLEC or a CLEC customer;
- (f) the extent to which orders are rejected by BellSouth's systems;
- (g) trouble report rates;
- (h) receipt to restore times;
- (i) mean time to repair;
- (j) out of service over 24 hours; and
- (k) timeliness of delivery of daily usage information for customer billing.

27. Produce copies of all documents that set forth, or from which one can determine, comparative performance information for BellSouth's retail operations and for unbundled network elements. Such information includes, but is not limited to:

- (a) trouble report rates;
- (b) receipt to restore;
- (c) out of service over 24 hours.

28. Produce copies of all documents that describe, or from which one can determine, BellSouth's rate of service order accuracy for CLEC orders received, and the service order accuracy rate for BellSouth's own retail operations, since January 1, 1997, for Tennessee and the BellSouth region. For purposes of this request, "rate of service order accuracy" may be defined as the percentage of orders that were prepared by BellSouth exactly as requested by BellSouth's own retail customers, and the percentage of orders that were prepared by BellSouth exactly as they were ordered or prepared by CLECs.

29. Produce copies of all documents that describe, or from which one can calculate, for the period since January 1, 1997:

- (a) the percentage of orders for BellSouth's retail customers that flowed through BellSouth's legacy systems, without manual intervention, after submission by the BellSouth customer service representative;
- (b) the percentage of CLEC orders that flowed through BellSouth's legacy systems, without manual intervention, after receipt from the CLEC.

30. Produce copies of all documents that set forth, or from which one can determine, for the period beginning January 1, 1997:

- (a) the number and percentage of held orders in BellSouth's retail operations;
- (b) the number and percentage of held orders of CLECs.

31. Produce copies of all documents that describe, or from which one can determine, BellSouth's provisioning accuracy for the period beginning January 1, 1997. For purposes of this request, "provisioning accuracy" may be defined as the percentage of BellSouth's retail customers who received exactly the service that they ordered from BellSouth, and the percentage of CLEC end users who received exactly what the CLEC ordered for them from BellSouth.

32. Produce copies of all documents that describe, or from which one can determine, BellSouth's bill quality, timeliness, and accuracy for its retail operations, and BellSouth's bill quality, timeliness, and accuracy for CLECs (including resale, unbundled network elements, or both), for the period beginning January 1, 1997.

33. Produce, for the period beginning January 1, 1997, copies of all reports and other

documents that describe, or from which one can calculate:

- (a) the number and percentage of repeat trouble reports for BellSouth's retail operations;
- (b) the number and percentage of repeat trouble reports for CLECs (both resellers and unbundled network elements).

34. Produce copies of documents sufficient to describe, or from which one could determine, the number and percentage of orders where BellSouth modified the due date on the service order:

- (a) in its retail operations;
- (b) for orders submitted by CLECs (both for Total Service Resale and for unbundled network elements)

35. Produce copies of documents sufficient to show:

- (a) the average amount of time that BellSouth requires to return a firm order confirmation notice after receipt of an order from a BOC;
- (b) the average amount of time that elapses when a BellSouth order is placed into its legacy systems and the time when the order is recognized as a valid order by the legacy systems.

36. Produce copies of documents that show, or from which one can determine, with respect to orders submitted to BellSouth by CLECs:

- (a) the extent to which the percentage of orders that are manually processed by BellSouth differ from one CLEC to another CLEC;
- (b) the extent to which the percentage of orders that are manually processed by BellSouth differ from one product or service to another product or service.

37. Produce copies of documents that describe, or from which one can determine:

- (a) the average time that BellSouth requires to provision CLEC orders;
- (b) the average time that BellSouth requires to provision orders for BellSouth's retail customers;
- (c) the extent to which the average time that BellSouth requires to provision orders varies from CLEC to CLEC;
- (d) the extent to which BellSouth determines the provisioning time for each CLEC;
- (e) the extent to which the average time that BellSouth requires to provision orders differs according to the particular product or service provisioned, both in BellSouth's retail operations and with respect to CLECs;
- (f) any reports, studies, analyses, or memoranda that discuss any of the provisioning times and matters described in (a) through (e) of this request.

38. Produce copies of any parity performance reports, studies, or analyses, or any other reports comparing BellSouth's performance for its retail operations with its performance for the CLECs, since January 1, 1997.

39. Produce copies of all documents that describe, with specificity, what particular unbundled network elements, and what particular combinations of unbundled network elements, can be ordered by CLECs through each of BellSouth's interfaces.

40. Produce copies of all documents that describe any priority, preference, or precedence that, in the installation or repair of service, BellSouth gives to:

- (a) particular customers;
- (b) a particular class or classes of customers;
- (c) particular products or services;
- (d) a particular class or classes of products or services.

41. Produce copies of any analyses, reports, studies, evaluations, or other documents prepared in connection with any review of BellSouth's OSS (including, but not limited to, any OSS features, functions, components, and interfaces) by any outside consultant or consultants. Such documents include, but are not limited to:

- (a) all documents which contain or set forth the scope of the consultant(s)' review(s);
- (b) all correspondence and any agreements constituting, evidencing or reflecting the consultant(s)' retention and the terms of that retention by BellSouth;
- (c) all documents constituting, evidencing, or reflecting the consultant(s)' work plans for the review(s), regardless of whether those plans were actually carried out;
- (d) all documents, information, and materials (whether paper, electronic, or any other form) that the consultant(s) have reviewed, considered, or relied upon in connection with each review of BellSouth's OSS;
- (e) all work product (whether written, electronic, or any other form) prepared by the consultant(s) in connection with the review(s) of BellSouth's OSS, including any and all analyses, memoranda, notes, interview notes, indices, summaries, logs and all other types of work product, and including, but not limited to, drafts or any preliminary reports in any form;
- (f) all documents that relate to any problems, deficiencies, recommendations, or areas that were identified by the consultant(s) in BellSouth's OSS, including but not limited to documents that reflect (1) the views of the consultant(s), and (2) any responses or actions taken in response by BellSouth.

42. Produce copies of any documents that discuss, relate to, or refer to the response times for pre-ordering transactions (whether for CLECs using the LENS interface or for BellSouth's own retail operations), including but not limited to (1) documents that contain any programmatically-

generated response time data comparing access from LENS to BellSouth's legacy systems with access from RNS, DOE, or SONGS to BellSouth's legacy systems, and (2) studies and analyses (whether or not completed) of response times.

43. Produce copies of all documents that discuss, or from which one can determine, the average time that BellSouth takes to send a notice of rejection to a CLEC when an order is rejected by BellSouth's systems.

44. Produce copies of all training materials, including any course syllabus or course outline, related to use of RNS and SONGS by BellSouth personnel or third parties.

45. Produce copies of all documents that discuss, relate, or refer to the API Gateway, including but not limited to documents that (i) discuss the API Gateway's purpose and scope; (ii) the business rationale for development of the API Gateway; (iii) anticipated use and users of the API Gateway; and (iv) the time frame for development and completion of the API Gateway.

46. Produce copies of all versions of BellSouth's "Electronic Interface Sales Pipeline."

47. Produce copies of all written methods and procedures concerning BellSouth's proposal for combining UNEs through collocation.

48. Produce copies of all documents that describe, discuss, or relate to alternatives to collocation for the combination of UNEs.

49. Produce copies of all documents that discuss any testing, studies, or actual commercial usage data relating to BellSouth's ability to provision collocated space or BellSouth's proposal to recombine UNEs through collocated space. (Such documents include, but are not limited to, test or study agreements, test or study plans, interim or final test or study results, and any documents summarizing or analyzing test or study results or actual commercial usage data).

50. If BellSouth will require AT&T or other CLECs to execute a "Master Collocation Agreement" before making collocated space available, please produce a copy of the most current version of this agreement.

51. Produce copies of all documents upon which BellSouth relies to establish that the costs of its collocation proposal are just, reasonable, and nondiscriminatory.

52. Produce copies of all documents that describe or discuss any complaints by CLECs concerning BellSouth's provision of collocated space.

53. Produce copies of all documents that describe or discuss any complaints by CLECs concerning loss of service during cut-over of a customer from BellSouth to CLEC service.

54. Produce the data dictionary, or its equivalent, that documents the contents of BellSouth's data warehouse referred to in Mr. Stacey's testimony and affidavits, along with all documentation identifying or describing the meaning of all data elements in the data warehouse. The information requested includes but is not limited to documents identifying or describing the following:

- 1 field name
- 2 field length
- 3 business meaning of the content of the field
- 4 table or tables where the field is stored
- 5 identification of whether the field is a primary or foreign key
- 6 permissible values for the field and the meaning if not self-evident.

55. Produce all pictures or visual representations of the data base schema pertaining to the data warehouse, which identifies the following information:

1. table relationships
2. use of fields as primary and foreign key
3. types of relationships between data base tables (i.e., one-to-many, one-to-one, many-to-one)
4. indexing (listing of indexed fields as well if they are unique indexes).

56. Produce all reports, whether production or test reports, reflecting BellSouth's performance in support of pre-ordering, ordering, provisioning, repair and maintenance, and billing for AT&T's operations as a CLEC in BellSouth's territory, generated by BellSouth since November of 1997. Also produce any explanatory information necessary to understand the meaning of the reports.

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CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that on this 20th day of January, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:


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